

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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In re OSG SECURITIES LITIGATION	:	Civil Action No. 1:12-cv-07948-SAS
_____	:	
	:	<u>CLASS ACTION</u>
This Document Relates To:	:	
	:	LEAD PLAINTIFFS' NOTICE OF MOTION
ALL ACTIONS.	:	AND MOTION FOR FINAL APPROVAL OF
_____	X	SETTLEMENTS AND PLAN OF
		ALLOCATION

TO: ALL PARTIES AND THEIR ATTORNEYS OF RECORD

PLEASE TAKE NOTICE that Lead Plaintiffs, Stichting Pensioenfonds DSM Nederland, Indiana Treasurer of State, and Lloyd Crawford, on behalf of the Class, through counsel, will move this Court on December 1, 2015, at 2:30 p.m., before the Honorable Shira A. Scheindlin, for entry of orders and judgments, pursuant to Rules 23 of the Federal Rules of Civil Procedure: (1) granting final approval of the three settlements; and (2) approving the proposed Plan of Allocation. This motion is based on: (i) Lead Plaintiffs' Memorandum of Law in Support of Motion for Final Approval of Settlements and Plan of Allocation; (ii) the Declaration of David A. Rosenfeld in Support of Lead Plaintiffs' Motion for Final Approval of Settlements and Plan of Allocation and Lead Counsel's Motion for an Award of Attorneys' Fees and Expenses and Reimbursement of Lead Plaintiffs' Expenses; (iii) the Declaration of Carole K. Sylvester; (iv) the Declarations of Lead Plaintiffs; (v) the Stipulations of Settlement; and (vi) all other proceedings herein.

Proposed orders will be submitted with Lead Plaintiffs' reply submission on or before November 24, 2015.

DATED: November 3, 2015

Respectfully submitted,

ROBBINS GELLER RUDMAN
& DOWD LLP
ELLEN GUSIKOFF STEWART
ROBERT R. HENSSLER JR.

s/ Ellen Gusikoff Stewart

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Lead Counsel for Lead Plaintiffs

CERTIFICATE OF SERVICE

I hereby certify that on November 3, 2015, I caused the foregoing Lead Plaintiffs' Notice of Motion and Motion for Final Approval of Settlements and Plan of Allocation to be served electronically on all ECF participants.

s/ Ellen Gusikoff Stewart

ELLEN GUSIKOFF STEWART